

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

5:21-cv-844-XR

GREGORY W. ABBOTT, et al.,

Defendants.

OCA-GREATER HOUSTON, et al.,

Plaintiffs,

v.

1:21-cv-0780-XR

JANE NELSON, et al.,

Defendants.

**OCA PLAINTIFFS' OBJECTIONS AND COUNTER-DESIGNATIONS TO DEPOSITION
DESIGNATIONS**

Pursuant to Federal Rule of Civil Procedure 26(a)(3), the Court's March 30, 2023, Scheduling Order (ECF No. 579), as amended at this Court's July 11, 2023, hearing, and the Parties' August 7, 2023, Advisory (ECF No. 699), OCA Plaintiffs hereby submit the following counter-designations to the deposition designations submitted by State Defendants (ECF Nos. 688-1, 688-2, 688-3). OCA Plaintiffs preserve and maintain all form objections raised by Private Plaintiffs' counsel during the depositions, and the inclusion of a counter-designation is in no way intended to waive such form objections.

Dated: August 15, 2023

1. Rule 30(b)(6) deposition of Isabel Longoria as designee for Harris County Elections Administrator, 4/22/2022

Isabel Longoria 30(b)(6) 4/22/202
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27:1-10
30:8-25
31:1-21
38:2-8
43:1-25
44:1-25
45:1-9
47:8-10, 17-22
48:3-10, 24-25
49:1-25
50:1
51:12-25
52:1-19
55:21-23
67:7-22
71:23-25
72:1-25
73:4-25
74:1-8
112:4-25
115:1-6
122:8-16
123:1-7
127:13-25
128:1-25
129:1-11
142:6-8
147:6-25
148:1
154:15-25
155:1-6
156:8-11
157:17-25
158:1-23

2. Deposition of Isabel Longoria, 4/20/2022

Isabel Longoria 4/20/2022
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108:1-22
190:9-25
110:1-25
111:1

3. Deposition of Yvonne Ramon, 4/21/2022

Yvonne Ramon 4/21/2022
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45:1-25
46:1-13
73:15-25
74:1-3
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109:21-25
110:1-10
116:18-25
117:1-6
122:20-22
129:21-23
138:23-25
139:1-12
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155:20-25
156:1-25
157:1-25
158:1-8
166:5-14
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170:1-25
186:9-14

**4. Rule 30(b)(6) deposition of Yvonne Ramon as designee for Hidalgo County Elections
Administrator, 5/10/2022**

Yvonne Ramon 30(b)(6) 5/10/2022
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70:1-4
132:19-25
133:1-25
134:1
136:6-25
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139:1-7
140:11-25
141:1-7
143:10-21
144:4-25
145:1-13, 23-25
146:1-12, 16-25
147:1-13, 21-25
148:1-14
149:20-25
150:1-11
156:21-25
157:1-4
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190:1-25
191:1-25
192:1-25
193:1-25
194:1-225
195:1-25
196:1-25
197:1-6
204:19-25
205:1-25
206:1-25
207:1-15
222:19-25

Yvonne Ramon 30(b)(6) 5/10/2022
223:1-7
224:13-17
232:8-25
233:1-25
234:17

5. Deposition of Chris Hollins 5/6/2022

Chris Hollins 5/6/2022
19:6–11
126:9–10, 12–20
175:2–22, 24–25
176:1–21
177:10–17, 19–21
178:7–25
179:1–2